

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LESSLER & LESSLER AL6649
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BIOSAFE-ONE, INC. d/b/a
www.biosafeone.com and
CHRIS JORGENSEN,

Plaintiffs

-against-

ROBERT HAWKS, BRAD SKIERKOWSKI;
NEWTECHBIO, USA a/k/a Brad & Company,
Inc. d/b/a www.newtechbio.com;
WWW.JUMBOMORTGAGES101.COM a/k/a
jumbomortgages.net, and BCI FUNDING
GROUP,

Defendants

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Hon. Denny Chin, USDJ
Hon. Douglas F. Eaton, USMJ
Civ. No. 07-6764 (DC)(DFE)

DECLARATION
OF
ROBERT HAWKS
and BRADLEY SKIERKOWSKI
Regarding Confidential
Information of Plaintiffs

STATE OF PENNSYLVANIA }
COUNTY OF LUZERNE } ss:

Pursuant to Title 28, Section 1746 of the United States
Code, we, Robert Hawks and Bradley Skierkowski, declare under
penalty of perjury that the following statements are true and
correct:

Declaration of Robert Hawks and Bradley Skierkowski
Regarding Confidential Information of Plaintiffs


1. We are defendants in the above-captioned action and have personal knowledge of the facts set forth in this declaration.

2. The only confidential information we acquired from the plaintiffs was that contained in mortgage applications and bank statements submitted by plaintiff Chris Jorgensen, and a credit report authorized by him. That confidential information did not include a customer list or a vendor list.

3. We have never obtained from any source a list of plaintiff's customers or vendors.

4. We have never initiated any communication to any person or entity known to either of us to be a customer or a vendor of plaintiffs.

Dated: August 28, 2007


Robert Hawks

Dated: August 28, 2007


Bradley Skierkowski